REMARKS

Applicants respectfully request reconsideration of this application as amended. Claims 1-8, 13-27 and 32-43 are pending in the application. Applicants thank the examiner for indicating that claims 1-8, 13-27, and 32-38 have been allowed.

The Examiner rejected claims 39, 41 and 43 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 4,722,008 of Ibaraki et al. (hereinafter "Ibaraki"). Applicants respectfully disagree with the rejection because Ibaraki does not disclose each and every element of the invention as claimed in claims 39, 41, and 43.

The Examiner argued Ibaraki discloses "adaptively sizing blocks with edges to create a plurality of blocks without edges [because] blocks discriminated as an edge are divided into pixels with levels smaller than an average signal level and pixels with levels larger than the average signal level" (Office Action, page 2, paragraph 3).

The Applicants respectfully disagree with the Examiner. Ibaraki describes determining whether an edge is present in a block. Upon determining that a block does contain an edge, the pixels in the block are divided into two groups and replaced with an average value for the specific group (Ibaraki, column 11, lines 50-64). However, the original block is not reduced or resized during the process. Rather the pixels within the block are merely separated into two groups so that the values can be replaced with an average pixel value (Ibaraki, column 12, line 25-53). Further, Ibaraki completes the replacement of pixel values while maintaining the edge within the block (Ibaraki, column 11, line 64 to column 12, line 43).

The Applicants respectfully submit that Ibaraki does not disclose "adaptively sizing blocks with edges to create a plurality of blocks without edges," as claimed by the Applicants in claim 39. According to claim 39, blocks are adaptively sized to create blocks without edges. Thus the block are sized and resized until no edges remain. Ibaraki, however, does not disclose

resizing a block. Rather Ibaraki merely replaces pixel values in a block after separating the pixels of the block into two groups, but the block is not resized. Furthermore, Ibaraki actually discloses maintaining an edge in a block and better rendering the edge, whereas the Applicants claim resizing blocks until only blocks without edges remain. Therefore, Ibaraki does not disclose "adaptively sizing blocks with edges to create a plurality of blocks without edges," as claimed in claim 39.

Thus, Applicants respectfully submit that Ibaraki does not disclose each and every element as claimed by the Applicants in Claim 39 and is not anticipated by Ibaraki under 35 U.S.C. § 102(b). Therefore, Applicants respectfully request withdrawal of the rejection of Claim 39 for at least the reasons discussed above. Since claims 41 and 43 contain features and limitations similar to those discussed with respect to Claim 39, claims 41 and 43 are also not anticipated by Ibaraki for at least the same reasons.

Accordingly, Applicants respectfully submit that the rejection under 35 U.S.C. § 102(b) has been overcome by the amendments and the remarks. Applicants submit that claims 39, 41 and 43 as amended are now in condition for allowance and such action is earnestly solicited.

The Examiner further objected to claims 40 and 42. However, because dependent claims 40 and 42, depend from independent claims 39 and 41, respectively, claims 40 and 42 are also in condition for allowance. Accordingly, Applicants respectfully submit that claims 40 and 42 are now in condition for allowance and such action is earnestly solicited.

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Respectfully submitted,

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